REMARKS

General

Applicant hereby traverses the outstanding rejections, and requests reconsideration and withdrawal in light of the remarks contained herein.

Applicant believes that the Office Action has typographical errors. Page 2, paragraph 2 of the Office Action identifies claims 1-4, 7-12, 15-19 and 22-23 as being rejected under 35 U.S.C. § 102(e). (emphasis added) However, there is only discussion of claims 1-3, 7-11, 15-19 and 22-23 in the § 102(e) section of the Office Action. Claims 4 and 12 are rejected under 35 U.S.C. § 103(a) and discussed in that section of the Office Action. Applicant thus believes, the list on page 2, paragraph 2 of the Office Action should reflect that claims 1-3, 7-11, 15-19 and 22-23 are rejected under 35 U.S.C. § 102(e).

Amendments to the Claims

Claims 1, 2, 7, 9, 10, 15, 22 and 23 have been amended by changing the word "column" to "list" in order to more clearly identify the invention. Claims 1 and 7 are amended for more consistent punctuation use. Claims 9 and 17 are amended to correct obvious typographical errors. Claims 7, 15 and 22 are amended to include an aspect of the invention that is enabled by lines 17-26 on page 6 of the originally-submitted specification.

Rejection under 35 U.S.C. § 102

Claims 1-3, 7-11, 15-19 and 22-23 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,092,036 to Hamann (hereinafter Hamann).

It is well settled that to anticipate a claim, the reference must teach every element of the claim, see M.P.E.P. § 2131. Moreover, in order for a prior art reference to be anticipatory under 35 U.S.C. § 102 with respect to a claim, "[t]he elements must be arranged as required by the claim," see M.P.E.P. § 2131, citing *In re Bond*, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990). Furthermore, in order for a prior art reference to be anticipatory under 35 U.S.C. § 102 with respect to a claim, "[t]he identical invention must be shown in as complete detail as is contained in the . . . claim," see M.P.E.P. § 2131, citing Richardson v. Suzuki Motor Co., .

9 U.S.P.Q.2d 1913 (Fed. Cir. 1989). Applicant respectfully asserts that the rejections do not satisfy these requirements.

Claim 1, as amended, defines a computer readable media comprising a localization spreadsheet that includes a fourth list of cells associated with respective ones of said identifiers, each cell having stored therein an alphanumeric string in a third natural language. Applicant asserts that Hamann does not teach or suggest at least this element of claim 1. Hamann does not teach or suggest a third natural language in the Application Text Translation Table 40. See Hamann, Figure 2. Rather, Hamann discloses constructing "an application text translation table 40 for *each* target language to be used on the system." Hamann, column 4, lines 25-27 (*emphasis added*). Thus, each table of Hamann would have at most two languages, namely source language and the target language. Therefore, Hamann does not teach or suggest a fourth list of cells associated with respective ones of a list of identifiers, each cell having stored therein an alphanumeric string in a third natural language. Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. § 102(e) rejection of claim 1 and asserts that claim 1 is allowable for, at least, the reason stated above.

Claim 9, as amended, defines a method of creating a string table comprising creating a localization spreadsheet that includes storing in a fourth list of cells alphanumeric strings in a third natural language where each of said alphanumeric string in said second natural language is associated with respective ones of said identifiers. Applicant asserts that Hamann does not teach at least this element of claim 9. Hamann does not teach or suggest a third natural language in the Application Text Translation Table 40. See Hamann, Figure 2. Rather, Hamann discloses constructing "an application text translation table 40 for *each* target language to be used on the system." Hamann, column 4, lines 25-27 (*emphasis added*). Thus, each table of Hamann would have at most two languages, namely source language and the target language. Therefore, Hamann does not teach or suggest a fourth list of cells associated with respective ones of a list of identifiers, each cell having stored therein an alphanumeric string in a third natural language. Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. § 102(e) rejection of claim 9 and asserts that claim 9 is allowable for, at least, the reason stated above.

Claim 17, as amended, defines a computer readable media having stored therein a means for associating alphanumeric strings in a third natural language with respective ones of said identifiers. Applicant asserts that Hamann does not teach at least this element of claim 17. Hamann does not teach or suggest a third natural language in the Application Text Translation Table 40. See Hamann, Figure 2. Rather, Hamann discloses constructing "an application text translation table 40 for *each* target language to be used on the system." Hamann, column 4, lines 25-27 (*emphasis added*). Thus, each table of Hamann would have at most two languages, namely source language and the target language. Therefore, Hamann does not teach or suggest a fourth list of cells associated with respective ones of a list of identifiers, each cell having stored therein an alphanumeric string in a third natural language. Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. § 102(e) rejection of claim 17 and asserts that claim 17 is allowable for, at least, the reason stated above.

Claims 23, as amended, defines a method of creating a string table comprising creating a localization spreadsheet that includes storing in a fourth list of cells alphanumeric strings in a third natural language where each of said alphanumeric strings in said third natural language is associated with respective ones of said identifiers. Applicant asserts that Hamann does not teach at least this element of claim 23. Hamann does not teach or suggest a third natural language in the Application Text Translation Table 40. See Hamann, Figure 2. Rather, Hamann discloses constructing "an application text translation table 40 for *each* target language to be used on the system." Hamann, column 4, lines 25-27 (*emphasis added*). Thus, each table of Hamann would have at most two languages, namely source language and the target language. Therefore, Hamann does not teach or suggest a fourth list of cells associated with respective ones of a list of identifiers, each cell having stored therein an alphanumeric string in a third natural language. Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. § 102(e) rejection of claim 23 and asserts that claim 23 is allowable for, at least, the reason stated above.

Claims 2-3, 7-8, 10-11, 15-16, 18-19 and 22 depend from claims 1, 9 and 17, respectively, and thus inherit all limitations of their respective base claim. Each of claims 2-3, 7-8, 10-11, 15-16, 18-19 and 22 sets forth features and limitations not taught or suggested by Hamann. Thus, Applicant respectfully asserts that claims 2-3, 7-8, 10-11, 15-16, 18-19 and 22 are patentable over the 35 U.S.C. § 102(e) rejection of record.

Rejection under 35 U.S.C. § 103

Claims 4-6, 12-14 and 20-21 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Hamann. Claims 4-6, 12-14 and 20-21 depend directly from claim 1, 9 or 17, and thus inherit all limitations of their respective base claim. Accordingly, Applicant respectfully asserts that claims 4-6, 12-14 and 20-21 are patentable and request the Examiner withdraw the 35 U.S.C. § 103(a) rejection of record.

Conclusion

In view of the above, Applicant believes each of the presently pending claims in this application is in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 08-2025, under Order No. 10004912-1 from which the undersigned is authorized to draw.

I hereby certify that this correspondence is being deposited with the United States Postal Service as Express Mail, Label No. EV482708678US in an envelope addressed to: MS Amendment, Commissioner for Patents, Alexandria, VA 22313.

Date of Deposit: 05-31-2005

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Respectfully submitted,

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